

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH GENATOSSIO, and  
MICHAEL GENATOSSIO,  
Plaintiffs,

v.

NORTH AMERICAN AIRLINES, INC.  
Defendant.

CASE NO.: 05-10881RGS

**JOINT MOTION TO EXTEND DEADLINES**

Plaintiffs Deborah Genatossio and Michael Genatossio and Defendant North American Airlines, Inc., respectfully move for an extension of the Court's Scheduling Order and, specifically, of each date by one month as follows:

<u>Event</u>	<u>Deadline</u>
Plaintiff Non-Expert Disclosures	4/14/06
Defendant Non-Expert Disclosures	5/14/06
Plaintiff Expert Interrogatories	5/14/06
Defendant Expert Interrogatories	6/12/06
Discovery Completed	6/15/06
Dispositive Motions	7/15/06
Responses to Dispositive Motions	7/29/06

The parties state that they are engaged in pre-discovery settlement negotiations and desire to explore all option for resolution prior to encountering additional expenses of discovery. Additionally, the Defendant has made an Offer of Judgment pursuant to Fed.R.Civ.P. 68.

Respectfully submitted,  
Plaintiffs, Deborah and Michael Genatossio,  
By their attorneys,

/s/ Stanley Helinski  
Stanley D. Helinski BBO # 644417  
Sarrouf, Tarricone & Flemming  
95 Commercial Wharf  
Boston, MA 02110  
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-and-

Defendant,  
North American Airlines, Inc.  
By and through its counsel,

/s/ Carey Bertrand  
Carey Bertrand, Esq. BBO# 650496  
Wilson, Elser, Moskowitz, Edelman & Dicker, LLP  
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Boston, MA 02110  
(617) 422-5300

Dated: March 14, 2006